

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

ESTATE OF THE UNBORN CHILD  
OF JENNIFER JAWSON, et al.,  
Plaintiffs,

v.

Case No. 19-CV-1008

ARMOR CORRECTIONAL  
HEALTH SERVICES, INC., et al.  
Defendants.

SPECIAL VERDICT

Deliberate Indifference Claim

1. Did Jennifer Jawson have an objectively serious medical need?

Yes ☒ No ☐

*If you answered "yes" to Question 1, then proceed to Question 2. If you answered "no" to Question 1, proceed to Question 7.*

2. Was Dr. Horton deliberately indifferent to Jennifer Jawson's objectively serious medical need?

Yes ☐ No ☒

*If you answered "yes" to Question 2, then proceed to Question 3. If you answered "no" to Question 2, proceed to Question 7.*

3. Did Dr. Horton's deliberate indifference cause Jennifer Jawson harm?

Yes ☐ No ☐

***If you answered "yes" to Question 3, then proceed to Question 4. If you answered "no" to Question 3, proceed to Question 7.***

4. What sum of money, if any, will fairly and reasonably compensate Jennifer Jawson for:

A. Past pain and suffering? \$ \_\_\_\_\_

B. Future pain and suffering? \$ \_\_\_\_\_

5. Was Dr. Horton's conduct malicious or in reckless disregard of Jennifer Jawson's Constitutional rights?

Yes \_\_\_\_\_

No \_\_\_\_\_

***If you answered "yes" to Question 5, then proceed to Question 6. If you answered "no" to Question 5, proceed to Question 7.***

6. If you answered "yes" to Question 6, you may, but are not required to, assess punitive damages against Dr. Horton. What sum of punitive damages would you assess against Dr. Horton?

\$ \_\_\_\_\_

***PROCEED TO NEXT PAGE***

State Law Negligence Claim

7. Was Dr. Horton negligent in her care and treatment of Jennifer Jawson?

Yes \_\_\_\_\_

No X \_\_\_\_\_

***If you answered "yes" to Question 7, then proceed to Question 8. If you answered "no" to Question 7, proceed to the end of the Verdict Form for signature.***

As to Plaintiff Jennifer Jawson: ***If you answered "yes" to both Question 2 and Question 3, please skip Questions 8–12, and proceed to Question 13.***

8. Was Dr. Horton's negligence a cause of injury to Jennifer Jawson?

Yes \_\_\_\_\_

No \_\_\_\_\_

9. Was Jennifer Jawson negligent regarding her own health and welfare?

Yes \_\_\_\_\_

No \_\_\_\_\_

***If you answered "yes" to Question 9, then proceed to Question 10. If you answered "no" to Question 9, proceed to Question 12.***

10. Was Jennifer Jawson's own negligence a cause of her injury?

Yes \_\_\_\_\_

No \_\_\_\_\_

11. Assuming the total negligence of all parties is 100%, what percent of fault do you attribute to:

Dr. Horton \_\_\_\_\_%

Jennifer Jawson \_\_\_\_\_%

Total: 100%

12. What sum of money, if any, will fairly and reasonably compensate Jennifer Jawson for:

A. Past pain and suffering? \$ \_\_\_\_\_

B. Future pain and suffering? \$ \_\_\_\_\_

As to Plaintiff the Estate of the Unborn Child of Jennifer Jawson:

13. Was Dr. Horton's negligence a cause of the death of the unborn child of Jennifer Jawson?

Yes \_\_\_\_\_

No \_\_\_\_\_

***If you answered "yes" to Question 13, then proceed to Question 14. If you answered "no" to Question 13, proceed to the end of the Verdict Form for signature.***

14. Was Jennifer Jawson negligent with regard to the health and welfare of her unborn child?

Yes \_\_\_\_\_

No \_\_\_\_\_

***If you answered "yes" to Question 14, then proceed to Question 15. If you answered "no" to Question 14, proceed to Question 17.***

15. Was Jennifer Jawson's own negligence a cause of the death of her unborn child?

Yes \_\_\_\_\_

No \_\_\_\_\_

16. Assuming the total negligence of all parties is 100%, what percent of fault do you attribute to:

Dr. Horton \_\_\_\_\_%

Jennifer Jawson \_\_\_\_\_%

Total: 100%

17. What sum of money, if any, will fairly and reasonably compensate Jennifer Jawson for the loss of society and companionship resulting from the death of her unborn child?

\$ \_\_\_\_\_

**END OF VERDICT FORM  
PLEASE SIGN AND DATE BELOW**

Jury Foreperson:

Geoff Hwang

Members of the Jury:

Grant Sauter

Amanda Lamm

Julie Braumstein

Kelso Schmitt

TSO Quiley

Mark Landon

Ryan Hogg

Dated: 02-28-24